

Revised 10/03

CORRES CONTROL  
INCOMING LTR NO

01061 RF03

DUE DATE  
ACTION

DIST	LTR	SPD
BERARDINI, J. H.	X	
BOGAR, E. S.	X	
BROOKS, L.	X	
BUTLER, I.	X	
CARPENTER, M.	X	
CHOCRETT, G. A.	X	
BECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETER, S. E.		
FERRERA, D. W.	X	
GIACOMINI, J. J.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NESTA, S.	X	
NORTH, K.	X	
PARKER, A. M.		
RODGERS, A. D.		
SHELYON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. B.		
WEMELT, K.		
WILLIAMS, J. L.		
ZAHM, C.	X	
H-2520, A. A.	X	
Rosumalan	X	
Lehtinen, A. X		
Anna, B. X		
Lavmuth, A. X		

COR CONTROL	X
ADMIN RECORD	X
PAT/330	

Reviewed for Addressee  
Corres Control RFP

11/25/03  
Date By

Ref Ltr #

DOE ORDER #  
5400 1

RECEIVED

2003 NOV 25 A 9 56

CORRESPONDENCE

CONTROL

STATE OF COLORADO

Bill Owens Governor  
Douglas H. Benvenuto Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

November 14, 2003

Mr. Joseph A. Legare, Assistant Manager  
Environment and Stewardship  
U S Department of Energy, RFFO  
10808 Highway 93, Unit A  
Golden, CO 80403-8200

Mr. Stephen Nesta, Environmental Manager  
Remediation, Industrial D&D, & Site Services  
Kaiser-Hill Company, L L C  
Rocky Flats Environmental Technology Site  
10808 Highway 93, Unit B, Building T130F  
Golden, CO 80403-8200

RE Approval of RCRA Stable Status for Tank 231A and Conditional Approval of Closure Description Document (CDD) for Closure of RCRA Interim Status Tank Units 43 01 (Tank T-231A) and 43 02 (Tank T-231B) - at the Rocky Flats Environmental Technology Site (RFETS)

Dear Mr. Legare and Mr. Nesta

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received your notice of intent to close interim status RCRA Tank Units 43 01 (Tank T231A) and 43 02 (Tank T231B) and has reviewed the *Closure Description Document for Closure of RCRA Units 43 01 and 43 02, Tanks 231A and 231B and Ancillary Equipment*. The Division received this CDD on October 10, 2003 attached to a letter dated October 8, 2003 from DOE and Kaiser-Hill. Tanks T231A and T231B managed aqueous mixed waste and are located outdoors southeast of Building 374.

The CDD specifies that the interiors of these two tanks will be decontaminated using a high-pressure detergent wash and then the interiors will be rinsed and the rinse waters will be sampled and analyzed to determine if clean closure has been achieved. Portions of Units 43 01 and 43 02 that do not meet the clean closure by decontamination performance standard will be removed and disposed of as hazardous/mixed waste. Ancillary equipment and secondary containment structures and materials will be closed by removal. Exterior portions of Tank 231A and its secondary containment structures that have come into contact with mixed waste from a previous sludge spill will be removed and disposed of as mixed waste. Other portions that are not contaminated with hazardous/mixed waste will be disposed of as non-hazardous waste. In accordance with Section B 3 of the approved *Closure Plan for Interim Status Units at the Rocky Flats Environmental Technology Site*, the Division hereby approves this CDD for the closure of Tank Units 43 01 and 43 02 as described therein, with the following conditions:

- 1 The CDD refers to the August 1997 version of the closure plan. However, the closure plan has been revised since 1997 and the current approved *Closure Plan for Interim Status Units at RFETS* is dated

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

ADMIN RECORD

IA-A-001270

November 14, 2003

February 2000 Thus, the closure activities for these two tanks must be conducted in accordance with the requirements of the current approved version of the closure plan

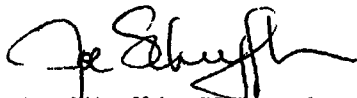
- 2 Based on an August 29, 2001 letter from DOE and Kaiser-Hill regarding hazardous waste "P" and "U" codes relative to Building 374 liquid operations, hazardous waste codes U103 and U108 apply (in addition to the codes identified in the CDD) to Tank Units 43 01 and 43 02 and these codes have been rendered compliant with the Land Disposal Restrictions (LDR) of 6 CCR 1007-3, Part 268
- 3 For the portions of the units being clean closed by decontamination, the closure performance standard for cyanide is 0.20 mg/L in the final rinse This standard is based on RFCA Attachment 5 Ground Water Tier II Action Levels per Section B 6 of the *Closure Plan for Interim Status Units at the Rocky Flats Environmental Technology Site*
- 4 For the portions of the units being clean closed by decontamination, the closure performance standard for acetonitrile in the final rinse is the method detection limit using the appropriate EPA SW-846 analytical method The closure performance standard proposed in the CDD for acetonitrile is based on an LDR standard The closure performance standard must be a human health risk-based standard, which the LDR standards are not Thus, the default closure performance standard is the method detection limit

Additionally, the Division has reviewed the September 16, 2003 request from Mr. Nesta of Kaiser-Hill to approve the RCRA Stable status of Tank T231A This request was received by the Division on September 18, 2003 Section F of the approved *Closure Plan for Interim Status Units at RFETS* allows the facility to render an interim status unit "RCRA Stable" as the first of two stages of an approved closure strategy Less stringent unit management practices may be implemented for RCRA Stable units with Division approval on a case-by-case basis considering the type and volume of residuals remaining in the unit and considering controls to prevent further additions of hazardous waste

In accordance with Section F of the approved *Closure Plan for Interim Status Units at RFETS* and based on our review of the submitted written justification for reducing the inspection frequency, the Division hereby approves the "RCRA Stable" status of Tank T231A Since this tank is "RCRA Stable," RCRA inspections of Tank T231A may now be conducted on a quarterly basis Since this tank is empty and isolated, the overfill protection and the monitoring of tank volume levels may be discontinued for Tank T231A

If you have any questions concerning these matters, please contact James Hindman at (303) 692-3345

Sincerely,



Joe Schieffelin, Unit Leader  
Hazardous Waste Compliance Unit

cc D Maxwell, DOE-RFFO  
M Heser, Kaiser-Hill  
A Rosenman, Kaiser-Hill  
D Shelton, Kaiser-Hill  
T Rehder, USEPA Region VIII  
S Garcia, City of Broomfield  
D Miller, AGO  
S Gunderson, CDPHE-HMWMD  
Administrative Record, RFETS Bldg T-130G



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